

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

Case: 4:24-cr-20375

Judge: Behm, F. Kay

MJ: Ivy, Curtis Filed: 07-17-2024

INDI USA v. DAVIS (tt)

UNITED STATES OF AMERICA,

v.

MACK DAVIS,

Defendant.

26 U.S.C. §§ 5841, 5861(d), and 5871

26 U.S.C. §§ 5822, 5861(f), and 5871

26 U.S.C. §§ 5822, 5861(c), and 5871

INDICTMENT

The Grand Jury charges:



COUNT ONE

26 U.S.C. §§ 5841, 5861(d), and 5871 Possession of an Unregistered Firearm

On or about June 17, 2024, in the Eastern District of Michigan, the defendant, MACK DAVIS, knowingly possessed a firearm, that is, a CBC (Rossi) Model RS22 semi-automatic .22 caliber rifle, a rifle having a barrel of less than 16 inches in length and a weapon made from a rifle as modified with an overall length of less than 26 inches and a barrel of less than 16 inches in length, which was not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT TWO

26 U.S.C. §§ 5822, 5861(f), and 5871

Manufacture of a Firearm in Violation of National Firearms Act

Between approximately April 29, 2024 and June 17, 2024, in the Eastern District of Michigan, the defendant, MACK DAVIS, knowingly made a firearm, that is, a CBC (Rossi) Model RS22 semi-automatic .22 caliber rifle, a rifle having a barrel of less than 16 inches in length and a weapon made from a rifle as modified with an overall length of less than 26 inches and a barrel of less than 16 inches in length, in violation of Title 26, United States Code, Sections 5822, 5861(f), and 5871.

COUNT THREE

26 U.S.C. §§ 5822, 5861(c), and 5871 Possession of a Firearm Made in Violation of the National Firearms Act

On or about June 17, 2024, in the Eastern District of Michigan, the defendant, MACK DAVIS, knowingly possessed a firearm, that is, a CBC (Rossi) Model RS22 semi-automatic .22 caliber rifle, a rifle having a barrel of less than 16 inches in length and a weapon made from a rifle as modified with an overall length of less than 26 inches and a barrel of less than 16 inches in length, made in violation of Title 26, United States Code, Sections 5822, 5861(c), and 5871.

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 3 of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses charged in Counts 1, 2, and/or 3 of this Indictment, defendant shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461, any firearm involved in defendant's violation, including, but not limited to the following:

A CBC (Rossi) Model RS22 semi-automatic .22 caliber rifle, serial number 7CA213982P the United States of America shall be entitled to forfeiture of substitute

property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/GRAND JURY FOREPERSON

DAWN N. ISON United States Attorney

s/ANTHONY P. VANCE ANTHONY P. VANCE Assistant United States Attorney Chief, Branch Offices

s/FRANCES CARLSON
FRANCES CARLSON
Assistant United States Attorney Deputy
Chief, Public Corruption and Civil
Rights

<u>s/ERIN MONJU</u>ERIN MONJUAttorney, Civil Rights Division

s/CHRISTOPHER W. RAWSTHORNE CHRISTOPHER W. RAWSTHORNE Assistant United States Attorney

Dated: July 17, 2024

Companion Case information MUS	ST be completed by A	AUSA and initialed.	_	
United States District Court Eastern District of Michigan	Criminal Case Co	Case: 4:24-cr-20375 Judge: Behm, F. Kay		
NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to co		MJ: Ivy, Curtis Filed: 07-17-2024 INDI USA v. DAVIS (tt)		
Companion Case Information		Companion Case Number:		
This may be a companion case based upon LCrR 57.10 (b)(4)¹:		Judge Assigned:		
☐ Yes ☑ No		AUSA's Initials: CR		
Case Title: USA v. MACK D.	AVIS			
County where offense occu	rred: GENESEE	 		
Check One: ☑ Felony ☐ Misdemeanor ☐ Petty				
XIndictment/Info	·	prior complaint [Case nu	mber: <u>24-mj-30234</u>] Superseding section below].	
Superseding to Case No: Judge:				
Original case was terminal Corrects errors; no additional Involves, for plea purpose Embraces same subject	onal charges or defenda es, different charges or a	nts. idds counts.	arges below:	
<u>Defendant name</u>	<u>Cha</u>	<u>rges</u> <u>Prio</u>	r Complaint (if applicable)	
Please take notice that the below the above captioned case. July 17, 2024 Date	Christophe Assistant U 210 Federa 600 Church Flint, Michie Telephone:	r W. Rawsthorne Inited States Attorney al Building n Street gan 48502 : (810) 766-5177		
		Email: Christopher.Rawsthorne@usdoj.gov WI Bar# 1059889		

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.